

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN HADNOTT, JESSIE HADNOTT, KEVIN HUNT, and BRANDELL BETTS,)	
)	
Plaintiffs,)	Case No. 07 C 6754
)	
v.)	Judge David H. Coar
)	
MICHAEL KELLY, MARC JAROCKI, PATRICK GILMORE, and CITY OF CHICAGO,)	Magistrate Judge Schenkier
)	
Defendants.)	

PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT

Plaintiffs, JONATHAN HADNOTT, JESSIE HADNOTT, KEVIN HUNT, and BRANDELL BETTS, by and through their attorney, Irene K. Dymkar, and pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, hereby move this Court to enter a judgment by default. In support of their motion, plaintiffs state:

1) This action was commenced by the filing of a complaint on November 30, 2007, alleging a cause of action under the Civil Rights Act of 1871 (42 U.S.C. §1983), to redress deprivations of the civil rights of plaintiffs through acts and/or omissions of defendants committed under color of law. Defendant CITY OF CHICAGO filed an appearance by counsel on January 14, 2008.

2) The third amended complaint was filed on July 16, 2008. The answer of defendant CITY OF DEFENDANT was due on July 30, 2008. No answer has been filed.

3) Defendants MICHAEL KELLY, MARC JAROCKI, and PATRICK GILMORE, who were new defendants added to this action by the third amended complaint,

were each duly served with a summons and complaint on July 24, 2008 (see Documents 56 - 58 for returns of service). Said defendants filed an appearance by counsel on August 11, 2008. Their answer was due on August 13, 2008. No answer has been filed.

4) Plaintiffs therefore ask for a default judgment and an assessment of damages.

WHEREFORE, plaintiffs JONATHAN HADNOTT, JESSIE HADNOTT, KEVIN HUNT, and BRANDELL BETTS request that a default judgment be entered against defendants MICHAEL KELLY, MARC JAROCKI, PATRICK GILMORE, and CITY OF CHICAGO, on all counts of the third amended complaint, and that a trial to determine the amount of damages be scheduled.

Dated: August 14, 2008

/s/ Irene K. Dymkar
Irene K. Dymkar

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